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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE: September 3, 1998

SUBJECT: Comments on ACS Superfund Site Focused Ecological Risk Assessment (FERA), Griffith, Indiana, 8/20/98, prepared by Black & Veatch Special Projects Corp. for USEPA.

FROM: James Chapman, Ph.D., Ecologist

TO: Sheri Bianchin, RPM

Thank you for the opportunity to review the above mentioned report. My comments are listed below (numbered and indented under the original report headings):

3.1 Ecological Effects to Birds - Table 2. Critical Doses of PCBs Producing Adverse Reproductive Effects...

- 1 There is no information describing how the doses were calculated for McLane and Hughes (1980) or Peakall and Peakall (1973). For example, Peakall and Peakall do not report either dove body weight or food consumption. The basis of the dose calculations should be provided, or the studies should be deleted from the ERA.

3.2 Selection of Adverse Effects Range

- 2 The sentence describing the mallard duck LOAEL should be deleted consistent with the changes made to Table 2.
- 3 The LOAEL range should be corrected to reflect the changes made in Table 2.

5.0 Risk Characterization - Table 4. Risk Characterization

- 4 Round HQs to one (or two) significant digits: Average HQ - 1 to 150; 95%UCL HQ - 2 to 260; Maximum HQ - 20 - 3000.

6.0 Conclusions

- 5 This section is unchanged from the previous version, and most of the discussion is no longer applicable. The conclusions should be rewritten to reflect the revisions made to the ERA.

8.0 Recommendations and Preliminary Remedial Goals

- 6 PRGs are still based solely on LOAELs. As stated in my previous comments (7/9/98), PRGs should be calculated for both LOAELs and NOAELs.

- 7 The PRG calculation based on mean LOAEL should be deleted. The mean LOAELs (or NOAELs) have no intrinsic significance.

I may be contacted at 6-7195 if you have questions or comments. Please fill out the attached evaluation form and return it to Larry Schmitt, SR-6J. The information is used to assess and improve our services.

cc: Larry Schmitt, Section Chief, RRS #1